

## APPENDICES

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## APPENDIX A

### LIST OF ABBREVIATIONS USED

ABCRC	Asheville-Buncombe Community Relations Council
AB Tech	Asheville-Buncombe Technical Community College
ABCCM	Asheville-Buncombe Community Christian Ministry
ACT	Assertive Community Treatment
ADA	Americans With Disabilities Act
ADDI	American Dream Downpayment Initiative
AHC	Affordable Housing Coalition
AHOPE	Day Center operated for the homeless by Hospitality House
AMI	Area median income
BCHC	Buncombe County Health Center
CAPER	Consolidated Annual Performance and Evaluation Report
CDBG	Community Development Block Grant (program)
CIP	Capital improvements plan
CoC (The Continuum)	Continuum of Care (Plan)
CPTED	Crime Prevention Through Environmental Design
CT	Census Tract
DENR	North Carolina Department of Environment and Natural Resources
DSS	Department of Social Services
EBL	Elevated blood lead level
EFRC	Emma Family Resource Center
ELI	Extremely low-income (30% of area median income and below)
FHAP	Fair Housing Assistance Program (HUD Grant program)
FMR	Fair Market Rent
FTE	Full-time equivalent
GED	General Equivalency Diploma
HAC	Housing Assistance Corporation
HACA	Housing Authority of the City of Asheville
HH	Households
HMDA	Home Mortgage Disclosure Act
HMIS	Homeless Management Information System
HOME	HOME Investment Partnerships Act (program)
HUD	U.S. Department of Housing and Urban Development
IDA	Individual Development Account
LBP	Lead-based paint
LI	Low-income (below 80% of AMI)
LIHTC	Low Income Housing Tax Credit
LPPP	The Lead Poisoning Prevention Program of UNCA

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LSWP	Lead-Safe Work Practices
M/F	Multifamily (housing)
MHO	Mountain Housing Opportunities
MMF	Mountain Microenterprise Fund
MSA	Metropolitan Statistical Area
NCHFA	North Carolina Housing Finance Agency
NHS	Neighborhood Housing Services
NIMBY	"not in my back yard"
PATH	Projects for Assistance in Transition from Homelessness
RBI	Regional Brownfields Initiative
S/F	Single family (housing)
SBA	(U.S.) Small Business Administration
SCORE	Service Corps of Retired Executives
SOP	Strategic Operating Plan (of the City of Asheville)
SRO	Single room occupancy
SSDI	Social Security Disability Income
SSI	Social Security Income
TANF	Temporary Assistance to Needy Families
The City	The City of Asheville
The Consortium	The Asheville Regional Housing Consortium (covering Buncombe, Henderson, Madison and Transylvania Counties)
The Plan (or this Plan)	The Consolidated Strategic Housing & Community Development Plan for 2005-2010
UDO	(City of Asheville) Uniform Development Ordinance
USDA	U.S. Department of Agriculture
VA	U.S. Veterans Administration
VLI	Very low-income (50% of area median income and below)
WCCA	Western Carolina Community Action
WIC	Women Infants and Children (federal nutrition program)
XRF	X-Ray Fluorescence (lead testing device)

## APPENDIX B

### REGULATORY CITATIONS

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HUD's regulations for the CDBG and HOME programs and the consolidated planning requirements are set out in Title 24 of the Code of Federal Regulations (CFR).

- CDBG regulations are in 24 CFR Part 570.
- HOME regulations are in 24 CFR Part 92
- The regulations governing the Consolidated Planning process are in 24 CFR Part 91.

These regulations are available to the public at the Asheville-Buncombe Main Library at 67 Haywood Street, at the City's Community Development Division office on the fifth floor of City Hall, and on the internet at [www.hudclips.org](http://www.hudclips.org).

## APPENDIX C

### FORMAL CONSULTATION AND COMMENTS RECEIVED

#### Focus Groups

The main vehicle for consultation on the Plan was through the five Focus Groups which were convened to establish priorities and strategies for affordable housing activities in each of the four Consortium counties and for non-housing community development activities in the City of Asheville. 163 people took part in the focus groups, including representatives of the following organizations.

Public Agencies	Non-profit Agencies	Community-Based Groups
<b><i>Buncombe County</i></b>		
Buncombe County Town of Weaverville U.S. Dept. of Agriculture UNCA Lead Poisoning Prevention Program	Community Action Opportunities Consumer Credit Counseling Service Eagle/Market Streets Development Corporation Helpmate, Inc. Council on Aging Neighborhood Housing Services UBIK Foundation Self-Help Credit Union NC Rural Community Assistance Project WC Rescue Ministries Hospitality House (for homeless) WNC Green Building Council Habitat for Humanity NC Independent Living Program (for disabled) NAACP Mountain Housing Opportunities Carolina Real Estate Investors Association Our Next Generation Children First Affordable Housing Coalition United Way	Shiloh Community Association  Deaverview Residents Association  Asheville Housing Authority Residents Association

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<b><i>Henderson County</i></b>		
Western Carolina Community Action (Section 8 Administrator) City of Hendersonville Henderson County Town of Mills River	Henderson County Affordable Housing Coalition Community Foundation of Henderson County Henderson County Habitat for Humanity Hendersonville Rescue Mission Housing Assistance Corporation Mainstay Faithlink	Mt. Laurel Community Services
<b><i>Madison County</i></b>		
Madison County Dept. of Social Services Hot Springs Housing Authority Madison County Dept. of Community Services	Community Action Opportunities Madison County Habitat for Humanity N. C. Independent Living Program Pisgah Legal Services	Community Housing Coalition of Madison County
<b><i>Transylvania County</i></b>		
Brevard Housing Authority Western Carolina Community Action U.S. Department of Agriculture	Transylvania County Habitat for Humanity	
<b><i>City of Asheville – Non-Housing Community Development</i></b>		
Asheville Buncombe Technical Community College Buncombe County Dept. of Social Services Metropolitan Sewerage District Asheville Transit System Regional Water Authority Land of Sky Regional Council of Government City of Asheville Historic Resources Commission Housing Authority of the City of Asheville City of Asheville Transit Commission UNCA Lead Poison Prevention Program	Eagle Market Streets Development Corporation Affordable Housing Coalition NAACP Consumer Credit Counseling Service Community Foundation of WNC Mountain Microenterprise Fund Grove Arcade Public Market Foundation Community Action Opportunities Asheville Area Chamber of Commerce Bountiful Cities Project Mission Children's Hospital Children First United Way of Asheville/Buncombe County Mountain Housing Opportunities The Mediation Center Neighborhood Housing Services NC Council for Women/ Domestic Violence Commission	Shiloh Community Association  Reed Creek Greenway

## **Formal Consultation on the Draft Plan**

The completed Housing Needs Assessment and draft Strategic Plan were published on the City of Asheville's Internet website and a notice of publication was placed in the Asheville Citizen Times on March 29, 2005. Copies of the plan in printed form and on compact disk were made available on request.

All agencies participating in the Focus Groups (listed above) were notified of the publication and invited to comment. Additionally, copies were sent to each Consortium Member Government:

Buncombe County  
Henderson County  
Madison County  
Transylvania County  
City of Hendersonville  
City of Brevard  
Town of Black Mountain  
Town of Montreat

Town of Weaverville  
Town of Woodfin  
Town of Flat Rock  
Town of Fletcher  
Town of Mills River  
Town of Laurel Park  
Town of Rosman

## **Written Comments Received**

Written comments were few and all favorable to the Plan. Some of those consulted pointed out typographical errors and suggested other minor corrections or clarifications. Henderson County also requested some changes to the affordable housing strategies proposed for Henderson County. All of the comments were incorporated into the final version.

## **Final Public Hearing**

The final public hearing on the draft Strategic Plan was held in front of Asheville City Council on April 12, 2005. No comments were made by members of the public.

## APPENDIX D

### ANTI-POVERTY STRATEGY (ASHEVILLE)

#### Introduction

HUD's regulations for the Consolidated Plan require that it describe "the jurisdiction's goals, programs, and policies for reducing the number of poverty-level families". This appendix contains a summary of the priorities and strategies that are intended to impact the number of people living in poverty within the City of Asheville. An assumption has been made that "poverty-level" income is roughly equivalent to income below 30% of area median income (AMI).

#### Priorities and Strategies Impacting the Number of People in Poverty

Reference	Summary
Affordable housing priorities and strategies	<ul style="list-style-type: none"> <li>• Provide affordable rental housing particularly for people earning near minimum wage               <ul style="list-style-type: none"> <li>o Maximize use of LIHTC funding</li> <li>o Preserve expiring Section 8 projects</li> <li>o Support non-profits developers who can serve very low income people</li> <li>o Build efficiencies and SRO units</li> <li>o Provide transitional rental housing for families in crisis</li> </ul> </li> <li>• Help those with special needs – the homeless , the frail elderly, and people with disabilities               <ul style="list-style-type: none"> <li>o Leverage S.811 and S.202 funding</li> <li>o Encourage accessibility for disabled occupants and "visitability" for guests</li> <li>o Support "shared housing"</li> </ul> </li> <li>• Preserve existing housing stock through rehabilitation               <ul style="list-style-type: none"> <li>o Support emergency repair programs</li> <li>o Use volunteer efforts to rehabilitate housing</li> </ul> </li> <li>• Help people succeed through support services coordinated with housing development</li> </ul>
Homelessness	<ul style="list-style-type: none"> <li>• All listed strategies and targets</li> </ul>



<p>Non-Housing Community Development</p>	<ul style="list-style-type: none"> <li>• Develop living wage employment (&gt;\$11 per hour)               <ul style="list-style-type: none"> <li>o Provide affordable or free employment training</li> <li>o Support counseling and job placement for dislocated workers, youth, and ex-offenders</li> <li>o Incentives for businesses to develop Brownfields and employ LI persons</li> <li>o Support youth employment and job training</li> <li>o Job coach program for young people entering job market</li> <li>o Continue to support employment services in S. Pack Square</li> <li>o Provide LI persons with clothing and tools needed for employment</li> </ul> </li> <li>• Provide services that support affordable housing, public transport, youth services and employment opportunities               <ul style="list-style-type: none"> <li>o Free bus passes to service agencies</li> <li>o Increase public transportation hours and frequency</li> <li>o Life skills training for LI persons</li> <li>o Increase accessibility of services for elderly</li> <li>o Car share programs</li> <li>o Transportation and child care for people in job training</li> <li>o Interim, drop-in and sick child care for job-seekers, those waiting for permanent child care, and shift workers</li> <li>o Substance abuse treatment</li> <li>o Community policing efforts to empower LI residents to take control of their neighborhoods</li> </ul> </li> <li>• Provide infrastructure to support affordable housing, transportation, and economic development               <ul style="list-style-type: none"> <li>o Sidewalks and bicycle paths for neighborhood connection and access to public transport, jobs, and services</li> <li>o Bus shelters in LI neighborhoods</li> <li>o Incentives for inclusionary zoning</li> </ul> </li> <li>• Services to help LI people improve financial well-being and avoid predatory lending               <ul style="list-style-type: none"> <li>o Provide materials in languages other than English</li> <li>o Include personal finance in school curriculums</li> <li>o Support legislation to deter predatory lending</li> <li>o Encourage service exchange programs ("Emma</li> </ul> </li> </ul>
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	<p>Bucks" model)</p> <ul style="list-style-type: none"> <li>• Support start-up and growth of small businesses               <ul style="list-style-type: none"> <li>o Access to capital for small businesses</li> <li>o Entrepreneurship training and technical assistance</li> </ul> </li> </ul>
Support 10-Year Plan to End Homelessness	<ul style="list-style-type: none"> <li>• Fund the 10-Year Plan to end homelessness</li> <li>• Create a referral service for homeless persons at shelters and other locations, including access to 211</li> <li>• Advertise homeless services to homeless persons as well as to service providers to increase awareness of programs</li> <li>• Provide and support transitional services for offenders re-entering the community, including transitional housing for offenders and their families</li> <li>• Implement a "secret shopper" to evaluate the effectiveness, accessibility, and level of respect of homeless services currently provided</li> <li>• Build capacity for permanent supportive housing and support services for homeless persons (as outlined in the 10-year plan)</li> <li>• Provide transportation for homeless persons (for example, free bus passes to access employment)</li> <li>• Create work programs for homeless persons</li> <li>• Support transitional housing that allows families to remain intact</li> <li>• Provide mental health services for homeless persons and evaluate eligibility for benefits (such as disability, social security, veterans, etc.)</li> <li>• Create a 24-hour Crisis Center (similar to the "23-hour House" in Wilmington, NC)</li> <li>• Increase the availability of substance abuse treatment for the homeless, and to prevent homelessness</li> </ul>

## APPENDIX E

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### SELECTION AND MONITORING OF SUBRECIPIENT PROGRAMS

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#### **Introduction**

Most of the programs funded with CDBG and HOME are not carried out by the City of Asheville or other Consortium member governments, but by non-profit agencies. Many of these agencies have been referred to in the sections of this Plan that describe “Institutional Structure”. Our area is rich in capable and innovative non-profit agencies.

The technical term for these agencies when they use CDBG or HOME funds is “subrecipient”. Some subrecipients qualify to be treated as Community Housing Development Organizations (CHDOs), which gives them greater latitude in their use of HOME funds. Some qualify as Community Based Development Organizations (CBDOs), which gives them greater latitude in the use of CDBG funds. Whichever category they fall into, the City of Asheville has an obligation to ensure that subrecipients use their CDBG or HOME funds to address the priorities in the Consolidated Plan and to do so efficiently, effectively, and in compliance with HUD regulations and with any local conditions placed on their programs.

#### **Allocation of Funding**

The allocation of CDBG and HOME funds is a difficult process. Requests for funding always exceed the funds available. The City endeavors to make the allocation process as fair and transparent as possible, and to protect Council Members from the intense lobbying that accompanies this process in some localities.

The application process opens up in late fall each year and all applicants are required to complete an application form by a due date at the end of January. Staff evaluate applications using an evaluation tool which assigns points for the extent to which the proposed project addresses Strategic Plan priorities, its feasibility and effectiveness, and the agency’s capacity to carry it out. The evaluation scores are used for information in the allocations process, but are not the sole determining factor.

Recommendations for CDBG funding are made by the City’s Housing and Community Development Committee. Recommendations for HOME funding are made by the HOME Consortium Board. However, in the case of HOME, most of the funds are pre-allocated geographically, and the Board pays special attention to the preferences expressed by local governments as to the use of funds in their locality.

Final approval of the CDBG and HOME allocations making up the annual Action Plan is the responsibility of Asheville City Council.

## **Grant Agreements**

The City executes a formal grant agreement with each subrecipient. The grant agreement includes standard requirements for compliance with HUD regulations, and also sets out a description of the work that the subrecipient will undertake, the performance targets it expects to achieve, and the budget for using CDBG or HOME funds. This grant agreement has the force of a legal contract and is the City's primary tool for ensuring accountability in the use of funds by subrecipients.

## **MONITORING POLICY**

### **Purpose**

1. Ensure that agencies receiving CDBG or HOME funds (including subrecipients, CBDOs and CHDOs) comply with all regulations and requirements governing administrative, financial and programmatic operations of the CDBG and HOME Programs.
2. Determine, in particular, that the agency is maintaining adequate documentation of client eligibility for CDBG or HOME assistance
3. Ensure that agencies perform the Scope of Services detailed in their contract and achieve their project performance target and outcomes within the established schedule and budget.
4. Confirm that agencies are taking appropriate actions when performance problems arise.
5. Utilize monitoring and technical assistance tools to help agencies improve the efficiency and capacity of their organization and operations.

### **Scope of Monitoring**

All agencies will be monitored using one or more of the following methods:

#### ***Progress Reports***

Required of all agencies based on the Scope of Services specified in their funding agreement.

Progress reports are to be submitted either monthly or quarterly. The agency agreement will specify the required reporting periods. Reports will include the following:

- Data on the status and accomplishments of their project(s) including the number of units completed and/or persons served;
- Program outcomes;
- Amount of funds expended or obligated;

- CDBG program income receipted and expended;
- Project schedule updates and any factors which adversely affect or hinder implementation;
- Project changes, opportunities, or new funding sources.

### ***Desk Reviews***

These are conducted by CD Staff when more specific or detailed information is needed or when potential problems are identified through progress reports or requisitions. Specific information needed for a desk review will be requested in writing and the agency will be given at least two weeks to provide the information. Desk reviews will include annual rental housing compliance reviews for HOME-assisted multifamily projects.

### ***On-Site Reviews***

Conducted by CD Staff at least annually for projects or agencies deemed to be high risk. High risk factors are elaborated below under risk assessment. In addition, on-site monitoring reviews will periodically be conducted for agencies with strong past performance in order to ensure long-term accountability and compliance. Three different types of on-site reviews will be conducted by CD Staff:

- 1) construction progress inspections in which the physical status of a project is reviewed,
- 2) targeted compliance reviews in which just one or two high-risk areas are reviewed, e.g. client eligibility, and
- 3) full compliance reviews in which the entire range of potential compliance issues is reviewed.

## **Risk Assessment**

Risk factors are assessed for each subrecipient and project to determine the level and frequency of monitoring. The primary risk factors are:

- New agency
- Agency expanding operations or implementing new program(s)
- Compliance problems in the past
- Performance problems (e.g. slow-moving activities)
- Agency experiencing turnover in key staff positions
- Agency undertaking multiple activities
- Activity involves complex compliance issues, e.g. rental housing or economic development projects.

## **Procedures for Full On-site Monitoring Review**

### ***Step #1: Prepare for the Monitoring Visit***

- Review applicable program rules, written agreements with agency, previous monitoring reports, project expenditures, and project progress reports;
- Schedule on-site monitoring visit. Agency will be notified at least two weeks prior to the monitoring visit. Notification will include the date of the visit, scope of the monitoring, information needed for review during the visit, and suggestion for staff that should be present.

### ***Step # 2: Conduct the Monitoring Visit***

- Hold entrance conference with Executive Director and/or key staff to provide an overview of the monitoring visit and answer any questions;
- Inspect physical progress of work (for rehab & new construction projects);
- Gather, review, and analyze the requested documentation;
- Interview staff persons as needed to collect information and gain further understanding of the project and/or organization;
- Hold exit conference with ED and/or key staff to report preliminary results, hear reactions and form conclusions.

### ***Step #3: Monitoring Letter***

- Provide a follow-up letter to agency within three weeks of the monitoring review;
- Explain the results of the review and when applicable set deadlines for a written response and corrective actions;
- Specify any technical assistance needs recognized during the review and make recommendations for the agency.

### ***Step #4: Follow-up***

- Ensure that agency responds to monitoring letter in a timely manner;
- Provide technical assistance as necessary;
- If necessary, carry out further targeted monitoring to confirm that corrective actions have been implemented;
- In cases of serious non-compliance, delay funding draws until corrective action is complete.